

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON, OHIO

ELWOOD H. JONES

Petitioner

Case No. 1:01-cv-564

v.

District Judge Thomas M. Rose  
Chief Magistrate Judge Michael R. Merz

MARGARET BAGLEY, Warden,

Respondent.

**Elwood H. Jones's Motion for Extension of  
Time to Complete Discovery**

Elwood H. Jones moves this Court for an order extending the discovery cut-off date to March 15, 2006.

**Elwood H. Jones's Memorandum in Support of Motion  
for Extension of Time to Complete Discovery**

Petitioner encountered some difficulties in scheduling the depositions. Petitioner wanted to take the depositions of the government attorneys first. Given the various schedules, we were unable to schedule the Government attorneys until January 30. We now have agreements with the defense attorneys to take their depositions on March 7 and March 14.

The Court in the notation order granting the discovery motion indicated that the discovery should be completed by February 15.

Mr. Crim has discussed this matter with the Warden's counsel, Mr. Hellman. The Warden does not oppose this motion.

Thus, this Court should grant the motion to extend the time for completing discovery to March 15, 2006.

**s/Micheal L. Monta**

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**s/ Gary W. Crim**

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#### **Certificate of Service**

I, Gary W. Crim, counsel for Elwood H. Jones, certify that on February 9, 2006, I served a copy of this Motion for Extension of Time to Complete Discovery on Counsel for the Warden, Gregory A. Perry and Heather L. Gosselin, by emailing it to [mhellman@ag.state.oh.us](mailto:mhellman@ag.state.oh.us) and [hgosselin@ag.state.oh.us](mailto:hgosselin@ag.state.oh.us).

**s/ Gary W. Crim**

GARY W. CRIM